

# Exhibit D

United States District Court for the Central District of California  
*In re Shimano Crankset Litigation*

**If you purchased, received, were given and/or owned a Designated Crankset or a bicycle equipped with a Designated Crankset in the United States, you may be eligible to receive benefits from a class action settlement.**

*A court has authorized this Notice. This is not a solicitation from a lawyer.*

A settlement has been reached in a class action lawsuit against Shimano North America Bicycle, Inc. and Shimano North America Holding, Inc. (together, “Shimano”), and Specialized Bicycle Components, Inc., Trek Bicycle Corporation, and Giant Bicycle, Inc. (collectively, “Defendants”). In September 2023, Shimano voluntarily recalled Shimano Hollowtech II cranksets in the United States that had been manufactured before July 2019 (the “Voluntary Recall”). Plaintiffs alleged breaches of warranties, and sought relief in connection with the advertising and marketing of Defendants’ products and the alleged inadequacy of the voluntary recall. There are no allegations that Plaintiffs have suffered any physical injuries from the cranksets involved.

**Who is Included?** You are a Settlement Class Member entitled to receive benefits under the Settlement if the following Settlement Class definition applies to you: all Persons who purchased, received, were given, and/or owned a Designated Crankset (defined below) in the United States, other than solely for resale purposes. This includes, without limitation, Persons who purchased, received, were given, or owned a bicycle equipped with a Designated Crankset.

Designated Crankset means any of the following Shimano cranksets manufactured before July 2019: Ultegra FC-6800, Ultegra FC-R8000, Dura-Ace FC-9000, Dura-Ace FC-R9100 and Dura-Ace FC-R9100-P, with any of the following production codes: KF, KG, KH, KI, KJ, KK, KL, LA, LB, LC, LD, LE, LF, LG, LH, LI, LJ, LK, LL, MA, MB, MC, MD, ME, MF, MG, MH, MI, MJ, MK, ML, NA, NB, NC, ND, NE, NF, NG, NH, NI, NJ, NK, NL, OA, OB, OC, OD, OE, OF, OG, OH, OI, OJ, OK, OL, PA, PB, PC, PD, PE, PF, PG, PH, PI, PJ, PK, PL, QA, QB, QC, QD, QE, QF, QG, QH, QI, QJ, QK, QL, RA, RB, RC, RD, RE, and RF.

**What Does the Settlement Provide?** If you are a Settlement Class Member, you may be eligible to receive the following Settlement benefits.

1. **Extended Warranty** – For Designated Cranksets otherwise covered by Shimano’s Express Warranty, Shimano will extend the duration of the Express Warranty by two (2) years from [date of Preliminary Approval Order]. This extension applies only to the Express Warranty’s coverage of bonding separation and delamination of the Shimano Designated Crankset. Delamination refers to the early stages of separation at the interface (the part where the two parts are bonded together) between the crank set body and cover. Evidence of delamination may include signs of corrosion and breaking. **You do not need to submit a Claim Form to receive extended Express Warranty coverage, it will be extended automatically.**
2. **Enhanced Inspection** – Under the Voluntary Recall, consumers were advised to contact a retailer in the United States that is authorized by Shimano to conduct inspections (a “Recall Retailer”) to schedule a free inspection of Designated Cranksets. Under this Settlement, Shimano agreed to enhance that inspection by: (1) distributing to every Recall Retailer a magnifying device with enhanced lighting; (2) distributing the Approved Enhanced Manual to Recall Retailers; (3) making Shimano employees available to Recall Retailers during normal business hours in California to advise about how to perform inspections; (4) requiring Recall Retailers to affirm that they have reviewed and will utilize all materials provided by Shimano related to the Inspections; (5) instructing Recall Retailers to make certain information available to Settlement Class Members whose Designated Crankset passes an inspection; and (6) providing public outreach regarding the Voluntary Recall; and
3. **Reimbursement of Costs** – Settlement Class Members may submit a Claim Form with supporting documentation to receive reimbursement of reasonable out-of-pocket costs for purchasing a replacement crankset and installing it on their bicycle. Reimbursement is not available if (a) the Designated Crankset was replaced on or after September 21, 2023, or (b) at the time of replacement, the Express Warranty was not expired as to that Designated Crankset. For Ultegra FC-6800 and FC-R8000 Designated Cranksets, the

Express Warranty expired two years after the date of original retail purchase. For Dura-Ace FC-9000, R9100, and FC-R9100-P Designated Cranksets, the Express Warranty expired three years after the date of original retail purchase.

**Other Options.** If you do not want the benefits of an extended warranty or reimbursed costs from this Settlement, but you instead want to keep the right to sue or continue to sue Defendants and the Released Persons on your own about the legal issues in this lawsuit, then you must submit an opt-out **postmarked** by **Month XX, 20YY**. If you do not opt-out, you may object to the Settlement, including the requested Attorneys' Fees Award and Service Awards, by filing an objection by **Month XX, 20YY**. The Long Form Notice on the Settlement Website explains how to opt-out or object. If you do nothing, you will not be reimbursed for your costs for replacement and installation. You will give up your right to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against the Released Persons about the legal claims that are released by the Settlement.

**Final Approval Hearing.** The Court will hold a Final Approval Hearing on **Month XX, 20YY**, to consider whether the Settlement is fair, reasonable, and adequate, and decide whether to approve the Settlement, Class Counsel's attorneys' fees and costs, and Service Awards. If you file a timely objection, you (or your lawyer) may ask to appear at the hearing, and the Court may hear objections at the hearing.

**This notice is a summary.** Learn more at [www.XXXXXX.com](http://www.XXXXXX.com) or call toll free 1-XXX-XXX-XXXX.